

# HEARING STATEMENT ON BEHALF OF COTSWOLD HOMES

Stroud Local Plan Review Examination Matter 7: Housing Provision

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## REPORT

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### Approval for issue

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Cameron Austin-Fell	CAF	10 February 2023
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#### Prepared by:

**RPS**

4th Floor  
1 Newhall St  
Birmingham B3 3NH

T +44 121 622 8520  
E alex.clarke@rpsgroup.com

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#### Prepared for:

**Cotswolds Homes**

## MATTER 7: HOUSING PROVISION

This Statement has been prepared by RPS on behalf of Cotswold Homes LTD (“CH”) in respect of their land interests on Bath Road, Leonard Stanley.

### **Issue**

*Issue 7 – Does the Plan set out a positively prepared strategy for the supply and delivery of housing development that is justified, effective and consistent with national policy? Are the policies for housing development, including those to meet specific needs, sound?*

### **Matter 7a Housing Supply**

**Q1 (a-c) As identified in Table 2 of the Plan, the site commitments are based on April 2020 data, except small sites which are based on April 2019. A) Are there more recent updates available? B) Why are sites with resolution to grant included as ‘firm commitments’ and C) There is a reliance on undeliverable commitments (some 620 dwellings) – is this considered justified?**

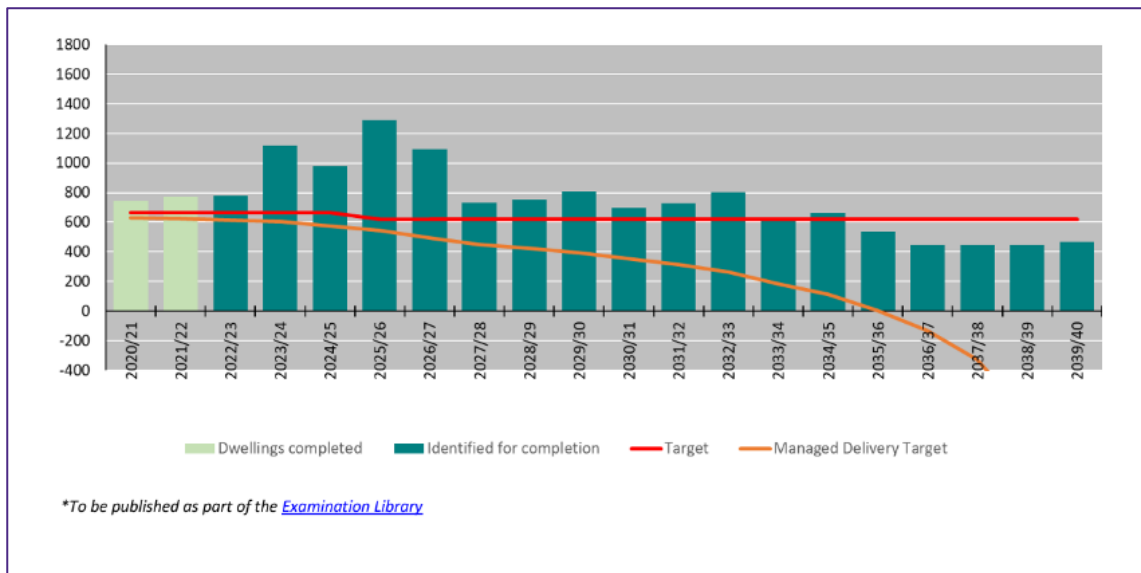
1. RPS observes that this question is [rightly] directed to the Council to answer. RPS understands that the Council’s evidence base here – the 2021 Topic Paper: Housing needs and supply **[EXAM EB8]** is now some 18 months out of date. It is however noted that there is a more recent land supply assessment published by the Council in December 2022, not included within the Examination Library. Whilst this does not cover the full plan period up to 2040/cache of sites, this document assists in answering some of these questions.
2. This information should be made available ahead of the Matter 7 hearing session, so that meaningful participation can be expected in the session.

**Q2) Does the supply identify sufficient land to accommodate at least 10% of the housing requirement on sites no larger than one hectare, in accordance with paragraph 69 of the Framework?**

3. The Council has not specifically set out the proportion of its supply that can be expected from smaller sites. As detailed in the proposed table of supply sources (**Table 3 of Exam CD1, P34**), Local Development Sites are expected to deliver 10.8% of the allocation strategy for the Council (985 dwellings, as part of the total 9,065 proposed). Whilst this may appear to answer the question, it is noted that a number of these proposals within this cohort of supply are on sites larger than one hectare (including Berkley, Whitminster and Kingswood to name a few).
4. Accordingly, it is likely that when removing sites greater than one hectare from the mix, the figure will fall below the 10% minimum figure.

**Q3. Paragraph 74 of the Framework states that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period. No such trajectory appears to be in the Plan. Is there a particular reason for this? Also has consideration been given as to ‘whether it is appropriate to set out the anticipated rate of development for specific sites’ within the Plan?**

5. The Council’s latest five-year housing land supply assessment (yet available on the examination pages) includes a draft trajectory, supported by tables setting out the supply from individual sources. However, this assessment doesn’t operate up to the end of the plan period, or include a breakdown of all sites. The excerpt below suggests that this exercise has been attempted, albeit unpublished.
6. As will be explained in response to Q7 (and in the Matter 5 & 6 statements), RPS does not agree with the trajectory presented by the Council and considers that an overly optimistic approach has been taken in respect of supply in the first 10 years of the plan. RPS will demonstrate why it is likely a significantly longer lead in time will be necessary and why sources of supply, mainly from strategic allocations, will deliver much later, with some growth outside the plan period.



**Q4. Is there sufficient flexibility in the housing trajectory to ensure that housing land supply within the Plan area will be maintained and will deliver the housing requirement?**

7. Table 3 of the 2022 5 year land supply report yet to be added to the examination library makes reference to 3,760 dwellings of supply expected to come forward in the next five years, against a requirement of 3,523 dwellings. This represents a buffer of only 237 dwellings. With little interrogation, it is quickly possible to find doubt and uncertainty in this position. In respect of the 5-year land supply position, the Council’s buffer lacks resilience.
8. In respect of the wider plan buffer, Table 3 of the submission plan [EXAMCD1, Page 34] sets out that the Council can demonstrate 10,340 units of supply, against a residual requirement of 8,005 (or a 30% buffer). As set out in submission plan [Table 3 of EXAM CD1, Page 34] around 8,080 or

78% of the Council's supply is forecast to come forward from significant allocations. Not simply 'major' developments, but urban extensions, new settlements and sites such as Sharpness Docks that require considerable remediation.

9. It is anticipated that the buffer across the plan period may be notably lower than the 30% set out in the submission plan on this basis. That would be reduced further if, as RPS propose, that the Council plan for the full 'uncapped' housing need of 652dpa is planned for, as it should be.

**Q5. Is there credible evidence to support the expected delivery rates set out in the housing trajectory? The annual housing requirement of 630 dpa would be a significant rise in house building rates from recent and historic trends in the borough. Does the evidence support that this is achievable?**

10. Yes. As indicated in response to Q7b below, RPS acknowledges that delivery of housing has been exceeded for the first two years of the plan.
11. RPS considers that whilst higher than the previous plan target, Stroud District is capable of accommodating such rates of growth as part of this round of plan making, and furthermore, consider that it is necessary to do so in order to deliver much needed affordable housing.
12. Clearly, the authority area is constrained by local factors including the topography of the District, and the coverage of the AONB. However, RPS consider that this requirement, and indeed the uncapped need figure of 652dpa can be sustainably met in the District.
13. RPS considers that the Council's approach to meeting this has the best of intentions but needs to include a more balanced supply of housing. Much of the housing proposed is contained in very significant extensions/new settlements that will require considerable time to service and whilst these sites may come forward, they are unable to do so in a way predicted by the Council. The ambitions of the Council should not be suppressed, however there needs to be an acceptance that more small/medium allocations should form part of the strategy, to allow these strategic allocations to come forward, some of which may well see partial delivery pushed back beyond the plan period.

**Q6. Does the allowance for windfall sites accord with paragraph 71 of the Framework?**

14. The approach as part of Paragraph 71 allows for windfall sites to be accounted for, providing that the Council can demonstrate compelling evidence that such supply exists. Here, Paragraph 71 invites us to look at sources including land availability assessments, or assessment of past delivery/future trends.
15. The Council's approach to windfall evidence is set out in Appendix 8 of the October 2020 Five Year Housing Supply document [**Exam EB14**, page 12]. This sets out that over the 10-year period between 2005-2015, there have been an average of 75 windfall completions in the District. The Council proposes to apply this figure of 75 dwellings across the remainder of the 17-year period, beyond the initial three which account for consents currently in the system.
16. Aggregated, this provides the Council with 1,275 dwellings from windfall sites, or 12% of the total allocations supply. RPS considers this to be a sizable figure, and one which the deliverability is

queried, on the grounds that the availability of small sites may now have diminished, and that the presence of the AONB may frustrate windfall growth. A more positive strategy, as RPS sees it, would be to include a smaller windfall allowance, aligned with an enhanced allocations strategy. Such a strategy could provide greater certainty of growth, with the added potential for increased delivery of benefits such as affordable housing.

17. There is a broader point relating to the evidence which also bears question. The 2020 land supply document has since been updated in 2022, again reiterating the evidence underpinning the 75dpa for windfall delivery. It is now seven years since this evidence was published, and RPS queries whether this indeed conforms with Paragraph 71 in offering compelling evidence. This evidence is clearly dated, and RPS would expect an updated position ahead of Examination hearing sessions.

**Q7. Although paragraph 68 of the Framework seeks that planning policies identify a supply of deliverable sites for ‘years one to five of the plan period’, the PPG advises that ‘strategic policies should identify a 5 year housing land supply from the intended date of adoption of the plan’. No practical purpose is served by assessing five year supply from an earlier date.**

**a) Can the Council produce a five year supply calculation looking forward five years from around the intended date of adoption of the plan? Is it based on robust evidence and is it justified?**

18. No, RPS considers that the Council will not be able to demonstrate a five-year supply on adoption. The evidence base supporting a five-year supply is not available to the examination, and what is there is dated.
19. The Council’s latest land supply position, referred to above, is dated December 2022, and sets out a purported position of 5.34 years. The Council here rightly assess the requirement using the Standard Method to be 671 dwellings per annum (“dpa”) (Table 2 refers), identifying a five year need for 3,523 dwellings (inclusive of a 5% buffer).
20. Table 3 of the 2022 land supply report also makes reference to 3,760 dwellings of supply expected to come forward in the next five years. This represents a buffer of only 237 dwellings. With little interrogation, it is quickly possible to find doubt and uncertainty in this position. Notably, Appendix 10 of the 2022 land supply statement refers to extant allocations from the 2015 Local Plan, proposed for reallocation, however yet to benefit from planning consent. These are expressed in the excerpt below. Delivery from these three sites alone is expected to contribute 415 dwellings. RPS considers that there is little demonstrable evidence that these sites will come forward in the manner expected by the Council and do not withstand scrutiny of the test of ‘deliverability’ set out in Annex 2 of the NPPF.

2. Local Plan allocations without planning permission:

Site Name	Summary of Deliverability	2022/23	2023/24	2024/25	2025/26	2026/27	Total
SA4 Hunts Grove Extension	Strategic allocation in adopted Local Plan 2015 and Stroud District Local Plan Review: Submission Draft Plan October 2021. Deliverability and viability tested at SDLP examination. Delivery planned to come on stream in tandem with later phases of current Hunts Grove development and with initial completions 2024/25.	0	0	110	110	75	295
SA5 Sharpness Docks	Strategic allocation in adopted Local Plan 2015 and local site allocation in Stroud District Local Plan Review: Submission Draft Plan October 2021. Deliverability and viability tested at SDLP examination. Canal and River Trust has track record of successful canal restoration projects. Frontloaded masterplan and technical evidence considered at SDLP examination. Significant progress made on outline planning application for mixed use development including 300 dwellings regarding agreement with Gloucestershire County Council over access and transport issues, updated ecological assessments and options to address HSC constraints. Delivery rates reflect delivery of specific initial parcels within Docks. Later delivery on greenfield site with no constraints. Delivery rates of 45, 35 are reasonable.	0	0	0	45	35	80
SA1d Brimscombe Mill	Strategic allocation in adopted Local Plan 2015 and local site allocation in Stroud District Local Plan Review: Submission Draft Plan October 2021. Deliverability and viability tested at SDLP examination. On-going discussions between the Council and landowners, with agreement between parties to masterplan the whole site; to resolve access issues and to demonstrate that both parts of the site can be delivered in a coordinated manner.	0	0	0	40	-	40

21. It is anticipated that further adjustments to the supply could be made on the basis of what the Council has published so far. However, the reporting lacks clear information in respect of the approach taken to consider lead in times and delivery rates. As such, the Council’s assessment remains opaque and impenetrable.
22. As set out in our Matter 5 statement concerning new settlements, we identify that the Council has overestimated the likely delivery from those sites, and importantly, has not set out expectations for lead in and delivery, aligned with evidence. A similar approach is taken in respect of the immediate supply, where the Council has provided limited justification for their delivery estimates.
23. This is seen quite plainly in the table below, which is taken from the latest land supply document, which considers schemes with planning consent. Here we can see that the Council is anticipating delivery of nearly 1,500 dwellings from two significant schemes. Collectively, these sites represent around 39% of the total five year supply.
24. What is however absent from this assessment is any clear evidence to consider whether delivery of nearly 300 dwellings from one site is realistic in a given year. Similarly, the Council provides no evidence of discussions with developers to support these assumptions.

Site Name	Summary of Deliverability	2022/23	2023/24	2024/25	2025/26	2026/27	Total
Land West of Stonehouse, Nastend Lane	Strategic allocation in Local Plan. Deliverability and viability tested at SDLP examination. Outline permission for 1350 dwellings granted April 2016. Reserved matters approval and completions progressing on the following phases: <ul style="list-style-type: none"> <li>• H1 – H4 138no. dwellings – Complete and occupied</li> <li>• H9 – H5 &amp; H8 – H10 270no. dwellings – Barratt Homes (178 completions)</li> <li>• H6 – H7 68no. dwellings – Redrow Phase completed and occupied except for 4 show homes.</li> <li>• Parcel H21 130no. dwellings – Complete and occupied</li> <li>• H11 and H12 165 dwellings – Redrow Homes (67 completions)</li> <li>• H16 and H19 178 dwellings – Vistry Homes (31 completions)</li> <li>• H17, H18 &amp; H20 131no. dwellings – Redrow Homes. Reserved matters approval granted July 2022</li> <li>• H13 and H14 216no. dwellings - Vistry Homes. Current reserved matters application pending consideration</li> </ul> Allocation proposed to be built out by the end of the five-year period. Site promoter estimate considered realistic.	285	318	139	-	-	742
Land north of Frampton on Severn Industrial Park, Lake Lane	Reserved matters approval for 19no. dwellings granted March 2022. Developer on site and all units under construction.	0	19	-	-	-	19
Colethrop Farm (Hunts Grove)	Crest Nicholson the main developer. 934 dwellings now completed at Hunts Grove and remaining development parcels set out below: <ul style="list-style-type: none"> <li>• R4, R9, R10 south, R13 – 16 &amp; R20B Phase 3 350no dwellings – Vistry Homes, formerly Bovis, (196 completions)</li> <li>• Parcels R11&amp; R12 Phase 4 83no. dwellings– Crest Nicholson. Reserved matters approval January 2020</li> <li>• Parcel R3, R3EL, R5 &amp; R7 Phase 4 164no. dwellings – Crest Nicholson. Reserved matters approval October 2020</li> <li>• Parcel R2, R6, R8 &amp; R10B Phase 4 146no. dwellings – Crest Nicholson. Reserved matters approval October 2020</li> <li>• Parcels R17, R18 &amp; R19 Hunts Grove Phase 4 128no. dwellings – Stantec. Reserved matters approval October 2020</li> </ul> Final outstanding application for reserved matters approval pending consideration for 38no. dwellings as part of the neighbourhood centre. Revised development total of 1,647 dwellings from 1,750 granted outline consent. Site promoter estimate considered realistic.	80	192	118	164	159	713
Dark Mills	New 100-year flood modelling of the site has just been completed confirming developability of the extant permission for 36 dwellings. Owner progressing options for bringing forward development within the five-year period alongside adjoining redevelopment at Wimberley Mills (see below) and within the wider local area at Brimscombe Port. Site owner estimate considered realistic.	0	0	12	12	12	36

25. At present, it remains unclear whether key sources of supply will be delivered as expected by the Council. Without a commensurate level of evidence, it stands, that a number of sources identified by the Council are not robustly grounded, and should not be included within the supply.

**a) Are any adjustments necessary to take account of any shortfall or over-supply since the Plan's base date?**

26. According to the Council's latest Housing Land Availability Assessment<sup>1</sup>, benched against April 2022, there have been 1,516 residential completions between April 2020 and March 2022. This is currently an overprovision against the current housing requirement. If the local housing need of 630 dwellings was assumed, this would result in an overprovision of +256 dwellings against the requirement to date. This would reduce to +212 dwellings, if the uncapped figure of 652 dwellings per annum were to be used.

27. In terms of how this should be applied, RPS would advise that this overprovision is spread across the remainder of the plan period, to 2040, rather than affecting the immediate need to boost the supply of housing.

**Matter 7b – Meeting Specific Housing Needs**

**Q10. Core Policy DCP2 sets out the modelled demand for older person homes and supports the provision of specialist older person housing. On major housing developments it expects a range of house types, including two bedroom dwellings and bungalows. It also supports other listed initiatives and developments. It summarises the need for adapted housing as established through the LHNA.**

**b) How will sheltered housing and extra care accommodation needs be achieved? Have needs been identified for other older person accommodation such as age-restricted general market housing?**

28. Policy DCP2 helpfully sets out the overall need for older persons housing need for the plan, identifying a total need for 3,091 homes, 2,811 of which are sheltered accommodation and 280 extra care homes. As an authority, Stroud has a considerable older person's housing need to address.

29. It appears as though the Council expects that this will be addressed through the suite of 'major' allocations presented in the plan. What is however unclear is how, collectively, this need will be addressed. The position set out in the policy presently remains as an aspiration, with no fixed objective to deliver this need in full, and address what appears to be a significantly worsening position of housing Stroud's aging population.

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<sup>1</sup> Not yet an examination document; Table 2, Page 4



30. CH would advocate a stronger, and much clearer position, which would see specific provisions made to the strategic allocations in the plan that are capable of making significant dents in the need. Here, it may be the case that the urban extensions and new settlements make a specific provision for such properties, which they should be doing in any event, in the delivery of balanced, sustainable communities.

**Q11. Questions on affordable housing are included under Matter 3 on the housing requirement. Our questions here relate specifically to Core Policy CP9, which requires at least 30% affordable housing on relevant sites above defined thresholds.**

**c. How much affordable housing will be delivered as a result of the Plan’s policies?**

31. The submission plan does not detail explicitly how much affordable housing can be expected as a result of the policy framework. The differing size triggers for the 30% affordable housing requirement presented in Policy CP9 do not appear to relate to the overall supply of housing expected in the plan, and the overall requirement for affordable housing, which is outlined in the first sentence of the policy.
32. That same sentence indicates that the Council area has an affordable need of 424 dpa. This is a significant forward need, and one which will plainly not be met by the current allocations strategy. In numerical terms, to deliver the need in full, 1,413 dwellings would be needed per annum, when set against a target of 30%. This would clearly be unsustainable in the context of balancing growth with local environmental issues, however it does beg the question (as we have set out in our response to Matter 3) whether greater housing provision could be made in order to shorten the gap in terms of the affordable housing need. It is clear from past delivery, as per the below table<sup>2</sup> that affordable delivery has averaged at around 166dpa for the past six years, less than half of the need identified.

Year	Rented	Shared Ownership	Other Affordable Ownership	Total
2016/ 2017	100	24	0	124
2017/ 2018	86	33	0	119
2018/ 2019	50	57	4	111
2019/2020	114	81	1	196
2020/2021	104	106	1	211
2021/2022	108	131	0	239
<b>Total</b>	<b>562</b>	<b>432</b>	<b>6</b>	<b>1,000</b>

Source: Reported under annual Local Authority Housing Statistics - Affordable Housing Supply

33. A further factor to consider here in support of this fact is that the Council is unlikely to deliver that 30% figure in any event. There will be sites such as Sharpness Dock for a proposed 300 dwellings, which may see affordable provision below the policy requirement on account of remediation linked to overall viability. Furthermore, as a largely rural authority, there will be a

<sup>2</sup> Taken from Stroud District Housing Land Availability Report (as of 01 April 2022), P17

number of sites, including windfall proposals, that will fall below the affordable threshold and will simply not contribute towards this overall goal. In short, by the end of the plan period, CH would expect a downward variance of affordable housing delivered against the 30% target.